



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Norman Ahrend  
Mother Nature's, Inc.  
11356 E. 51<sup>st</sup> Pl.  
Tulsa, OK 74146

**MAR 22 2013**

RE: MUR 6542  
Mother Nature's, Inc.

Dear Mr. Ahrend:

On March 30, 2012, the Federal Election Commission notified Mother Nature's, Inc. of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to Mother Nature's, Inc. at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, on March 12, 2013, the Commission found no reason to believe that Mother Nature's, Inc. violated 2 U.S.C. § 441b by making a prohibited corporate contribution to Mullin for Congress. The Factual and Legal Analysis, which more fully explains the Commission's decision, is enclosed for your information.

Documents related to the case will be placed on the public record within 30 days. *See* Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66,132 (Dec. 14, 2009).

If you have any questions, please contact Dominique Dillenseger, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

Peter G. Blumberg  
Assistant General Counsel

Enclosure  
Factual and Legal Analysis

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**FEDERAL ELECTION COMMISSION**

**FACTUAL AND LEGAL ANALYSIS**

**RESPONDENT:** Mother Nature's, Inc.

**MUR 6542**

**I. INTRODUCTION**

This matter was generated by a complaint filed with the Federal Election Commission by Morgan Anderssen-Williams, alleging a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Mother Nature's, Inc.

**II. FACTUAL AND LEGAL ANALYSIS**

The Complaint alleges that Mother Nature's, Inc. violated the Federal Election Campaign Act of 1971, as amended ("the Act") by making a prohibited corporate contribution to Mullin for Congress and Debbie Dooley in her official capacity as treasurer ("Committee"). Compl. (Mar. 19, 2012); *see* 2 U.S.C. § 441b.

Corporations are prohibited from making contributions in connection with a federal election, and candidates are prohibited from knowingly accepting or receiving corporate contributions. *See* 2 U.S.C. § 441b(a); 11 C.F.R. § 114.2(b)(1). Contributions that present genuine questions as to whether they were made by a prohibited source, such as a corporation, may be either deposited or returned to the contributor within ten days. 11 C.F.R. § 103.3(b)(1). If the contribution is deposited, the treasurer must make his or her best efforts to determine the legality of the contribution. *Id.* If the contribution cannot be determined to be legal, the treasurer must refund the contribution within 30 days of receipt. *Id.*

The Committee admits, and its disclosure reports show, that the Committee received a contribution from Mother Nature's, Inc. The Committee asserts, and its reports reflect, however,

- 1 that this impermissible corporate contribution was timely refunded.<sup>1</sup> See Mullin Resp. at 5-7.  
2 The Committee's 2011 October Quarterly Report shows a receipt of \$1,000 from Mother  
3 Nature's, Inc. on July 15, 2011 and a refund in the same amount on the same day.<sup>2</sup>

- 4 Therefore, the Commission found no reason to believe that Mother Nature's, Inc. violated  
5 2 U.S.C. § 441b by making a prohibited corporate contribution to Mullin for Congress.

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<sup>1</sup> Mother Nature's acknowledged having made the contribution. Mother Nature's seems to indicate that its check was returned and it made a new check to Mullin. See Mother Nature's, Inc. Resp. (June 26, 2012).

<sup>2</sup> Sheila Ahrend of Mother Nature's, Inc. subsequently made a \$1,000 contribution to the Committee on August 23, 2011. See 2011 October Quarterly Report; Mother Nature's Resp. There is no allegation and we are aware of no evidence suggesting that the funds used to make this contribution were reimbursed from corporate sources.

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